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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*A. B., by and through her Guardian Ad  
 Litem, Jeffrey Brown v. Meta Platforms Inc.,  
 et al., 4:25-cv-03927;*

*S.V., filed on behalf of minor S.V. v. Meta  
 Platforms, Inc.; Instagram, LLC; Bytedance  
 Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok,  
 LLC; TikTok, Inc., 4:25-cv-03982;*

*A.W. filed on behalf of minor B.W. v. Meta  
 Platforms, Inc.; Instagram, LLC and Snap,  
 Inc., 4:25-cv-04208;*

*T.W. filed on behalf of minor A.W. vs. Meta  
 Platforms, Inc., Instagram, LLC, ByteDance,  
 Ltd., ByteDance, Inc., TikTok, Ltd., TikTok,  
 LLC., TikTok, Inc. and Snap, Inc., 4:25-cv-  
 04474;*

*E.A., individually and as next of friend to  
 minor Plaintiff A.A. v. Meta Platforms, Inc.  
 et al., 4:25-cv-04965;*

*N. C., by and through her Guardian Ad  
 Litem, Andrew Cash v. Meta Platforms, Inc.,  
 et al., 4:25-cv-06334;*

**ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL EXHIBITS TO THE  
 DECLARATION OF JENNIE LEE  
 ANDERSON IN SUPPORT OF PLAINTIFFS'  
 FIFTEENTH CONSOLIDATED *EX PARTE*  
 APPLICATION FOR APPOINTMENT OF  
 GUARDIANS *AD LITEM***

1 *J.L. filed on behalf of minor E.L. v. Meta*  
 2 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 3 *Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok,*  
 4 *LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-*  
 5 *06381;*

6 *A.W., by and through her Guardian Ad*  
 7 *Litem, Crystal Welch v. Meta Platforms, Inc.,*  
 8 *et al., 4:25-cv-06619;*

9 *J.W. filed on behalf of minor A.W. v. Meta*  
 10 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 11 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 12 *LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-*  
 13 *07186;*

14 *N.E. filed on behalf of minor T.E. v. Meta*  
 15 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 16 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 17 *LLC and TikTok, Inc., No. 4:25-cv-7205;*

18 *A.S. filed on behalf of minor A.S. v. Meta*  
 19 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 20 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 21 *LLC and TikTok, Inc., No. 4:25-cv-7218.*

22 Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for  
 23 administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of  
 24 Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Fifteenth Consolidated *Ex Parte*  
 25 Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) and attached as  
 26 Exhibits 1-11 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Fifteenth  
 27 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson  
 28 Declaration”).

The Applications for which sealing is sought are:

- *A. B., by and through her Guardian Ad Litem, Jeffrey Brown v. Meta Platforms Inc., et*  
*al., 4:25-cv-03927 (Exhibit 1);*
- *S.V., filed on behalf of minor S.V. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
*Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc., 4:25-cv-03982 (Exhibit 2);*

- 1 • *A.W. filed on behalf of minor B.W. v. Meta Platforms, Inc.; Instagram, LLC and Snap,*  
2 *Inc.*, 4:25-cv-04208 (Exhibit 3);
- 3 • *T.W. filed on behalf of minor A.W. vs. Meta Platforms, Inc., Instagram, LLC, ByteDance,*  
4 *Ltd., ByteDance, Inc., TikTok, Ltd., TikTok, LLC, TikTok, Inc. and Snap, Inc.*, 4:25-cv-  
5 04474 (Exhibit 4);
- 6 • *E.A., individually and as next of friend to minor Plaintiff A.A. v. Meta Platforms, Inc. et*  
7 *al.*, 4:25-cv-04965 (Exhibit 5);
- 8 • *N. C., by and through her Guardian Ad Litem, Andrew Cash v. Meta Platforms, Inc., et*  
9 *al.*, 4:25-cv-06334 (Exhibit 6);
- 10 • *J.L. filed on behalf of minor E.L. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
11 *Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-  
12 06381 (Exhibit 7);
- 13 • *A.W., by and through her Guardian Ad Litem, Crystal Welch v. Meta Platforms, Inc., et*  
14 *al.*, 4:25-cv-06619 (Exhibit 8);
- 15 • *J.W. filed on behalf of minor A.W. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
16 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-  
17 07186 (Exhibit 9).
- 18 • *N.E. filed on behalf of minor T.E. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
19 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7205  
20 (Exhibit 10).
- 21 • *A.S. filed on behalf of minor A.S. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
22 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7218  
23 (Exhibit 11).
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1 This motion is accompanied by a [Proposed] Order and the Declaration of Jennie Lee  
 2 Anderson in Support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the  
 3 Declaration of Jennie Lee Anderson in Support of Plaintiffs' Fifteenth Consolidated *Ex Parte*  
 4 Application for Appointment of Guardians *Ad Litem* ("Anderson Decl. ISO Admin Motion"),  
 5 pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

6 This Court previously considered and finding good cause granted Plaintiffs' request to  
 7 seal applications for guardian *ad litem* in this case. ECF No. 16.

8 Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for a  
 9 standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants  
 10 confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to  
 11 seek an order or orders in the future to unseal individual applications and/or require parents who  
 12 wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl.  
 13 ISO Admin. Mot. to Seal, ¶5.

14 For the reasons set forth above, Plaintiffs respectfully request that the Court enter the  
 15 [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibits in  
 16 Support of Plaintiffs' Fifteenth *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

17  
 18 Dated: October 3, 2025

Respectfully submitted,

19 **ANDRUS ANDERSON LLP**

20 /s/ Jennie Lee Anderson

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